

Pro Se 1 2022

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SARAI FLORES,

Plaintiff(s),

v.

STATE OF WASHINGTON,
WASHINGTON STATE
ADMINISTRATIVE OFFICE OF THE
COURTS, SUPERIOR COURT OF
WASHINGTON COUNTY OF PIERCE,

Defendant(s).

CASE NO. 3:22-cv-06000-TL
{to be filled in by Clerk's Office}

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☐ Yes ☒ No**I. THE PARTIES TO THIS COMPLAINT****A. Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Sarai Flores
Street Address	233 E. Southern Ave #26804
City and County	Tempe, Maricopa County
State and Zip Code	Arizona 85285
Telephone Number	602-218-1404

Pro Se 1 2022

B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	STATE OF WASHINGTON
------	---------------------

Job or Title (if known)	
-------------------------	--

Street Address	1125 Washington Street SE PO Box 40100
----------------	--

City and County	Olympia, Thurston County
-----------------	--------------------------

State and Zip Code	Washington 98504-0100
--------------------	-----------------------

Telephone Number	(360) 753-2727
------------------	----------------

Defendant No. 2

Name	WASHINGTON STATE ADMINISTRATIVE OFFICE OF THE COURTS
------	---

Job or Title (if known)	
-------------------------	--

Street Address	1112 Quince St SE
----------------	-------------------

City and County	Olympia, Thurston
-----------------	-------------------

State and Zip Code	Washington 98501
--------------------	------------------

Telephone Number	360-753-3365
------------------	--------------

Defendant No. 3

Name	SUPERIOR COURT OF WASHINGTON COUNTY OF PIERCE
------	--

Job or Title (if known)	
-------------------------	--

Street Address	930 Tacoma Ave S #334
----------------	-----------------------

City and County	Tacoma, Pierce County
-----------------	-----------------------

State and Zip Code	98402
--------------------	-------

Telephone Number	253-798-3654
------------------	--------------

Pro Se 1 2022

Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*select all that apply*)

☒ Federal question:

If checked complete section A.

☐ Diversity of citizenship:

If checked complete section B.

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1. This is an action under Title II of the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 12131 et seq., and the Rehabilitation Act of 1973, 29 U.S.C. § 794 et seq.

Pro Se 1 2022

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. Plaintiff is an individual with a disability as defined by the ADA and the Rehabilitation Act. Plaintiff has cognitive disabilities and psychiatric disabilities that significantly impact her ability to communicate, and participate in legal proceedings while experiencing emotional distress. Plaintiff brings this action on behalf of herself and all others similarly situated people.
2. Defendant WASHINGTON STATE is a state government entity that operates the court system in WASHINGTON STATE. Defendant WASHINGTON STATE ADMINISTRATIVE OFFICE OF THE COURTS is a state administrative office responsible for the operation and management of the court system in WASHINGTON STATE. Defendant SUPERIOR COURT OF WASHINGTON COUNTY OF PIERCE is a state court that is part of the WASHINGTON STATE court system and is responsible for hearing cases in PIERCE COUNTY.
3. On March 3, 2022, the plaintiff requested accommodations for her court proceedings due to her cognitive and psychiatric disabilities. The request was sent to the deputy court administrator, Dea Finigan, and a copy was also sent to the Commissioner, Terri Farmer. The request was denied on the same day via a phone call with Dea Finigan.
4. On March 4, 2022, the plaintiff again requested accommodations for the next hearing.
5. On March 9, 2022, the accommodation request was officially granted [in part] and denied in part.
6. The court denied the plaintiff's request for an appointment of counsel.

Pro Se 1 2022

- 1 7. Although the court granted some additional accommodation requests [in part] those
2 requests were constructively denied due to the failure of the court's accommodation
3 request procedures and protocol.
- 4 8. The court's procedure of simply placing the accommodation request in the court file did
5 not adequately accommodate the plaintiff resulting in the constructive denial of all the
6 requested accommodation requests.
- 7 9. During two separate hearings, there was no mention of the accommodations that had been
8 requested.
- 9 10. WASHINGTON STATE and the WASHINGTON STATE ADMINISTRATIVE
10 OFFICE OF THE COURTS have failed to properly educate and train PIERCE COUNTY
11 SUPERIOR COURT on cognitive and psychiatric disabilities.
- 12 11. This has resulted in PIERCE COUNTY SUPERIOR COURT failing to provide
13 reasonable modifications or accommodations to the plaintiff.
- 14 12. In addition, defendants have failed to properly educate and train courts on the needs and
15 accommodations required for individuals with cognitive and psychiatric disabilities. As a
16 result, judges and court staff are unaware of the necessary accommodations and
17 modifications that should be provided to such individuals.
- 18 13. As a result of defendants' failure to provide reasonable modifications or accommodations
19 and to properly educate and train courts on cognitive and psychiatric disabilities, plaintiff
20 and other individuals with such disabilities have been denied equal access to the PIERCE
21 COUNTY SUPERIOR COURT system and have been subjected to discrimination and
22 unequal treatment.

15. Further, the nuances of ongoing complex civil litigation continue to cause the plaintiff debilitating emotional distress, physical distress, and anxiety due to her disabilities.

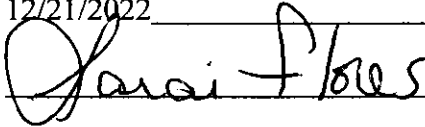
State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

COMPLAINT FOR A CIVIL CASE - 6

*Pro Se 1 2022***V. CERTIFICATION AND CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/21/2022
Signature of Plaintiff 
Printed Name of Plaintiff SARAI FLORES

Date of signing: _____

Signature of Plaintiff _____

Printed Name of Plaintiff _____

Date of signing: _____

Signature of Plaintiff _____

Printed Name of Plaintiff _____